

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON SALEM DIVISION

In re: )  
 )  
TIMOTHY BRIAN CRUNKLETON )  
JESSICA MOORE CRUNKLETON, ) Case No. B-22-50764 C-13W  
 )  
Debtor(s). )

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**OBJECTION TO CONFIRMATION**

Now comes Kathryn L. Bringle, Chapter 13 Trustee, who objects to confirmation of the Debtor(s) Proposed Plan and in support of her objection shows the following:

1. Timothy Brian Crunkleton and Jessica Moore Crunkleton (“the Debtor(s)”) filed a Chapter 13 Petition on December 22, 2022. The Debtor(s) filed an Amended Proposed Plan on February 9, 2023 (Doc. 18). Notice of Plan and Time for Filing Objection Thereto was filed on February 21, 2023 (Doc. 21).
2. The Trustee objects to confirmation of the proposed plan because tax returns have not been filed by either Debtor for the year 2019 according to the proof of claim of the Internal Revenue Service.

**WHEREFORE**, the Trustee respectfully requests that:

1. Confirmation of the proposed plan be denied;
2. The Court grant such additional and further relief as it deems just and proper.

Date: March 14, 2023  
KLB/plc

s/ Kathryn L. Bringle  
Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT  
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WINSTON SALEM DIVISION

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TIMOTHY BRIAN CRUNKLETON	)	
JESSICA MOORE CRUNKLETON,	)	Case No: B-22-50764 C-13W
	)	
Debtor(s).	)	

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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that the foregoing Objection to Confirmation was served on the following parties by mailing a copy by first-class postage prepaid mail addressed as follows:

TIMOTHY BRIAN CRUNKLETON  
JESSICA MOORE CRUNKLETON  
408 N ELM STREET  
APARTMENT B  
CHERRYVILLE, NC 28021

JOHN T ORCUTT  
6616-203 SIX FORKS ROAD  
RALEIGH, NC 27615

LAW OFFICES OF JOHN T ORCUTT  
ATTN: ATTORNEY BEN BUSCH  
2100 W CORNWALLIS DRIVE, UNIT O  
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AIS PORTFOLIO SERVICES LLC  
ATTN ALLY FINANCIAL DEPT  
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OKLAHOMA CITY, OK 73118

INTERNAL REVENUE SERVICE  
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US ATTORNEY  
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CRYSTAL R SIMMONS  
BANKRUPTCY SPECIALIST  
INTERNAL REVENUE SERVICE  
INSOLVENCY 4905 KOGER BOULEVARD SUITE 1029  
GREENSBORO NC 27407-2734

NOT ON MATRIX

Date: March 14, 2023  
KLB/plc

s/ Kathryn L. Bringle  
Chapter 13 Trustee